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David J. Stadley, Clerk

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

UNTED STATES OF AMERICA

§ §

CRIMINAL NO. M-19-1502-S1

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SYLVIA GARCES VALDEZ FRANCES SALINAS DE LEON

v.

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

From at least June 4, 2018 and continuing through at least December 6, 2018, in the Southern District of Texas, the defendant,

SYLVIA GARCES VALDEZ

did corruptly give, offer, or agree to give a thing of value to any person intending to influence and reward an agent of the City of La Joya, a local government that received benefits in excess of \$10,000 pursuant to a Federal program involving a grant, contract, subsidy, loan guarantee, and other forms of Federal assistance in 2018, in connection with any business, transaction, or series of transactions of such state government and agency involving something of value of \$5,000 or more: namely, Defendant gave, offered, and agreed to give cash to Frances Salinas De Leon intending to influence and reward Person B, an elected official for the City of La Joya, for their influence in granting a public relations contract to the Defendant.

All in violation of Title 18, United States Code, Sections 666(a)(2) and 2.

COUNT TWO

From at least June 4, 2018 and continuing through at least December 6, 2018, in the Southern District of Texas, the defendants,

SYLVIA GARCES VALDEZ and FRANCES SALINAS DE LEON

did intentionally and knowingly devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises in execution and for the purpose of executing said scheme and artifice transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, any writings, signals, pictures or sounds, namely the following email:

DATE	WRITING	FROM	<u>TO</u>
June 13, 2018	Email	chemgarces2187@icloud.com	francesanasalinas@gmail.com

In violation of Title 18, United States Code, Sections 1343, 1346, and 1349.

NOTICE OF CRIMINAL FORFEITURE18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)

Pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), the United States gives notice to the defendants,

SYLVIA GARCES VALDEZ and FRANCES SALINAS DE LEON

that upon conviction for the offenses in this Indictment, all property, real or personal, which constitutes or is derived from proceeds traceable to such offense, is subject to forfeiture.

Property Subject to Forfeiture

The property subject to forfeiture is approximately \$22,000.00. In the event that a condition listed in Title 21, United States Code, Section 853 exists, the United States will seek to forfeit any other property of the defendant in substitution up to the total value of the property subject to forfeiture. The United States may seek the imposition of a money judgment.

A TRUE BILL			
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RYAN K. PATRICK UNITED STATES ATTORNEY

ASSISTANT UNITED STATES ATTORNEY